

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

STUART A. WILLIAMS,

Plaintiff,

v.

RHONDA M. SIMPSON and
CONCRETE DEVELOPMENTS LLC,

Defendants.

Civil Action No. 1:22-cv-00208-JL

PLAINTIFF’S STATUS REPORT RE PENNSYLVANIA LITIGATION

Following an in-chambers videoconference on September 28, 2022, this Court granted a stay of this action, and directed Plaintiff Stuart Williams (“Plaintiff”) to file a status report on December 27, 2022, and every ninety (90) days thereafter. *See* Minute Entry dated September 30, 2022. Plaintiff filed his initial status report on December 27, 2022 (Doc. 15), and subsequent status reports on March 27, 2023 (Doc. 16), June 27, 2023 (Doc. 17), September 25, 2023 (Doc. 18), and December 26, 2023 (Doc. 19). Plaintiff now submits this status report.

As previously reported, the stay in this case was granted based on the pendency of a lawsuit brought by Plaintiff in the Court of Common Pleas in Allegheny County, Pennsylvania, Civil Division, Case No. 21-001084 (the “PA Litigation”); the two defendants in the present action, Rhonda M. Simpson (“Ms. Simpson”) and Concrete Developments LLC (“Concrete Developments”), are two of the ten (10) named defendants in the PA Litigation.

The present status of the PA Litigation is as follows. In previous reports, Plaintiff advised that two other defendants in the PA Litigation, David G. Cherup and Concrete Stone Masters of Florida, had filed a Petition to Strike and/or Open Judgment. On March 22, 2024, the PA Court issued an order directing Plaintiff to re-appear for his deposition relating to that pending Petition. After the completion of that deposition, the PA Court will set an argument date for consideration of the Petition and related pleadings, as well as a Writ of Coram Nobis which was recently filed by Defendant David Montoya. Additionally, as reported in the December 26, 2023 status report (Doc. 19), the parties in the PA Litigation remain in the process of scheduling depositions for Ms. Simpson and one employee of Concrete Developments. While the Consent Case Management Order (“Case Mgt. Order”), as reported in the Sept. 25, 2023 status report (Doc. 18), remains in effect, it is anticipated that the PA Court will revise the deadlines in the Case Mgt. Order once all depositions have been completed, and a hearing on the pending Petition and related pleadings is complete.

Plaintiff will provide this Court with a further update concerning the PA Litigation in ninety (90) days, on June 24, 2024.

Dated: March 25, 2024

Respectfully submitted,

STUART A. WILLIAMS,

By his attorneys,

/s/ Laura L. Carroll

Laura L. Carroll (NH Bar #17444)

Lawrence G. Green (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically served a copy of this document on all counsel of record via the Court's CM/ECF system, pursuant to Fed. R. Civ. P. 5(b)(2)(E).

Dated: March 25, 2024

/s/ Laura L. Carroll
Laura L. Carroll